

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DAVID L. BURG <i>and</i> ASSOCIATION OF	)	
NEW JERSEY RIFLE & PISTOL CLUBS,	)	
INC.,	)	
	)	Civil Action No. 24-10076
<i>Plaintiffs,</i>	)	RMB-AMD
	)	
v.	)	
	)	
MATTHEW PLATKIN, et al.,	)	
	)	
	)	
<i>Defendants.</i>	)	

**NOTICE OF MOTION FOR A PRELIMINARY INJUNCTION**

**(Relief Requested Prior to January 7, 2025)**

TO: David Leit, Esq.  
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**PLEASE TAKE NOTICE**, that pursuant to this Court’s Scheduling Order (ECF No. 5) Plaintiffs, David L. Burg and Association of New Jersey Rifle & Pistol Clubs, Inc. (collectively “Plaintiffs”) shall move before the Honorable Renee M. Bumb, U.S.D.J., at the United States Courthouse, Mitchell H. Cohen Building & U.S. Courthouse 4th & Cooper Streets, Camden, NJ

08101, for an Order granting a preliminary injunction, pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1, enjoining the operation and effect of certain provisions of New Jersey's Extreme Risk Protective Order Act, N.J.S.A. 2C:58-20, *et seq.* other provisions of New Jersey law and for other emergent relief as set forth in the filed Complaint.

**PLEASE TAKE FURTHER NOTICE** that in support of the within motion, Plaintiffs shall rely upon the following documents:

- 1) Declaration of David L. Burg, and
- 2) Brief.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs request oral argument.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

Dated: November 7, 2024

Respectfully submitted,

s/ Daniel L. Schmutter  
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